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October 14, 1999

CCN# 00-000297

Mr. Mark M. Holzmer
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CENTRAL FACILITIES AREA (CFA) LANDFILL ACCEPTABILITY FOR COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SOIL DISPOSAL – MCT-053-99

Reference: Mark M. Holzmer letter to Michael J. Wolters, Central Facilities Area Landfill Acceptability for CERCLA Remedial Action Soil Disposal, August 27, 1999

Dear Mr. Holzmer:

In the reference letter, you stated that Argonne National Laboratory-West (ANL-W) will be excavating approximately 100 cubic meters of soil as part of a CERCLA remedial action, and that the preferred disposal facility for the excavated soil is the CFA landfill. You further stated that the Idaho Division of Environmental Quality and Environmental Protection Agency (EPA) Region X require that the soil be disposed of in a landfill that complies with the CERCLA off-site acceptability criteria for non-RCRA landfills, and requested documentation that the CFA landfill meet these criteria.

The requested documentation is provided below for each of the criteria listed in your letter.

1. Criterion: The CFA landfill is in compliance with applicable state and federal regulations.

Response: The CFA landfill complex is considered a Non-Municipal Solid Waste Landfill and is operated and maintained in accordance with the requirements of 40 Code of Federal Regulations (CFR) 257 Subpart A. Once the recently drafted Solid Waste Management Rules and Standards under Idaho Administrative Procedures Act (IADPA) 16.01.06 are promulgated and in effect (anticipated next year), the CFA landfill will also meet the applicable requirements under these new regulations. The existing and future landfill cells will also be closed in accordance with Section 055.01.d of the future State of Idaho regulations, which include installation of a two-foot minimum cover, and notation in the federal property records that the land has been used as a landfill facility.

2. Criterion: If releases have occurred from older, inactive waste units, the releases are addressed and are in compliance with a legally binding agreement.

Response: With the development of the Federal Facility Agreement/Consent Order and Action Plan (effective date December 9, 1991), the Department of Energy, EPA, and the Idaho Department of Health and Welfare determined that closed CFA landfills I, II and III should be evaluated under CERCLA. The CFA landfills were referred to as Operable Unit 4-12. In August 1992, a Remedial Investigation/Feasibility Study (RI/FS) was initiated to determine if the existing landfill cover adequately protected human health and the environment, including the Snake River Plain Aquifer.

The risk assessment performed as part of the RI/FS indicated that the CFA landfills did not present an unacceptable risk to human health or the environment. However, due to uncertainty associated with the landfill contents and the need for containment of the landfill contents, it was determined that a remedial action was warranted for the site. In October 1999, a record of Decision (ROD) was issued titled "Declaration for Central Facility Area Landfills, I, II and III (Operable Unit 4-12), and No Action Sites (Operable Unit 4-03)." The selected remedy was to minimize the CFA landfills as a source of potential groundwater contamination and reduce potential risks associated with exposure to contaminated waste.

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(Criterion 2, continued)

The major components of the selected remedy include:

- Placement of a native soil cover to a minimum depth of two feet, compacted and graded to minimize erosion and infiltration of surface water
- Implementation of administrative controls on future land use
- Conducting groundwater, surface water, and/or vadose zone monitoring
- Periodically inspecting and maintaining the cover
- Maintaining institutional controls, including signs, postings, and land use restrictions

3. Criterion: The CERCLA soils will be buried at least four feet below grade.

Response: The ANL-W soil will be placed at or near the bottom of the active cell at the CFA landfill, which is 15-20 feet below the finished grade of the cell, before capping. In addition, as stated earlier, the State of Idaho regulations as proposed will require the installation of a final cover layer at least 24 inches in depth. Pictures will be taken and forwarded to ANL-W showing the location of the placed soil relative to the cell wall, demonstrating that the soil will be buried at least four feet below grade.

The ANL-W soil will be considered Conditional Waste, and will require appropriate approvals prior to shipping as identified in Section 4.3 of the INEEL Reusable Property, Recyclable Materials, and Waste Acceptance Criteria (RRWAC). The point of contact for this waste shipment will be L. H. Shepherd, who, in particular, should be contacted at 526-8019 prior to shipment of the soil to ensure pictures are taken to demonstrate depth of burial.

If you need additional information or have any questions or comments, please contact me at 526-9523, or Tim Carlson of my staff at 526-8062.

Sincerely,



M. C. Tiernan, Area Director
Waste Reduction Operations Complex

TLC:bar

cc: G. L. Beausoleil, DOE-ID, MS 4201
T. L. Carlson, BBWI, MS 8101
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WROC Project File, WROC-PROJ-037,
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